DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action
Environmental Indicator (EI) RCRAInfo code (CA725)

Current Human Exposures Under Control

Last Revised: September 2005

Facility Name: BEI/Philip Services Corporation - Washougal
Facility Address: 625 South 32nd Street, Washougal, Washington
Facility EPA ID: WAD 09230 0250

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

   ___**X**_ If yes - check here and continue with #2 below.

   _____ If no - re-evaluate existing data, or

   _____ if data are not available skip to #6 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY,

and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment

requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRAInfo national database ONLY as long as they remain true (i.e., RCRAInfo status codes must be changed when the regulatory authorities become aware of contrary information).

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	Yes	No	?	Rationale/Key Contaminants
Groundwater	X			Volatile organic compounds (VOCs), arsenic exceed MTCA Method B standards for groundwater
Air (indoors) [2]			X	TCE measured in indoor air during soil vapor sampling could be the result of vapor intrusion
Surface Soil (e.g., <2 feet)		X		
Surface Water			X	
Sediment			X	
Subsurface Soil (e.g., >2 feet	X			VOCs exceed MTCA Method B standards for soils
Air (outdoors)		X		

_____ If no (for all media) - skip to #6, and enter "YE," status code after providing or citing appropriate "levels," and referencing sufficient supporting documentation demonstrating that these "levels" are not exceeded.

__**X**__ If yes (for any media) - continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

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[1] "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

[2] Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggests that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

_____ If unknown (for any media) - skip to #6 and enter "IN" status code.

Rationale and References:

Groundwater: Results of groundwater sampling indicate that concentrations of tetrachloroethene (PCE), 1,1-dichloroethene (1,1-DCE), cis-1,2-dichloroethene (cis-1,2-DCE), vinyl chloride, benzene, 1,4-dioxane, and arsenic exceed MTCA Method B levels in groundwater underlying the Philip Services Corporation's (PSC's) property. (See ***Quarterly Report, September – December 2004, Philip Services Corporation, Washougal Facility, Washougal, Washington***, dated April 15, 2005.)

Indoor air: Contaminated groundwater exists beneath Building 1 at the facility. In response to Ecology concerns and requests for indoor air monitoring, modeling based on soil gas sampling under Building 1 was conducted and data submitted in the ***Revised Supplemental Remedial Investigation Technical Memorandum*****,** dated July 2002.

In June 2005, PSC collected 8-hour indoor air samples, an ambient air sample, and an 8-hour sub-slab soil gas sample to assess the potential risks associated with sub-slab soil gas to indoor air in the office spaces of Building 1. Freon 12 and trichloroethene (TCE) were detected in soil gas and indoor air above ambient air concentrations. Concentrations of Freon 12 in indoor air were similar to concentrations in ambient air, so ambient air could be the source of Freon 12 in indoor air. TCE was detected in indoor air at levels that exceed the MTCA Method C air cleanup level. However, TCE was not detected in ambient air samples, so it is possible TCE in indoor air may be attributable to a source within the building. Six other VOCs were detected in soil gas but not in indoor air above ambient air concentrations [1,1-DCE, 1,1-dichloroethane, cis-1,2-DCE, 1,1,1-trichlorethane (TCA), and PCE]. (See ***Supplemental Remedial Investigation II: Vapor Intrusion Sampling, Philip Services Corporation, Washougal Facility, Washougal, Washington***, dated August 10, 2005.)

Subsurface soil: Sampling results indicated that concentrations of PCE exceeded MTCA Method B standards at GP-15 (located on the east side of Building 1 along former tank farm area) at four feet below ground surface (bgs). Refer to ***Technical Investigation, Washougal Silt Investigation*****,** dated November 1996. Contaminated soil was left in-place along the west-side of the existing building footings (east side of former tank farm). Also, residual soil concentrations of PCE and vinyl chloride above MTCA Method B remain beneath the former tank farm at depths greater than four to six feet. (See Figure 6-3 in ***Final Interim Action Report*****,** dated September 1998.)

3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

Potential **Human Receptors** (Under Current Conditions)

"Contaminated" Media	~~Residents~~	Workers	~~Day Care~~	Construction	~~Trespassers~~	Recreation	~~Food~~[3]
Groundwater		Yes		Yes		?	
Air (indoors)		Yes		Yes		No	
Surface soil (e.g., <2 feet)		No		No		?	

[3] Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

Surface Water		No		No		?	
Sediment		No		No		?	
Subsurface soil (e.g., >2 feet)		Yes		Yes		?	
Air (outdoors)		No		No		No	

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors' spaces for Media which are not "contaminated") as identified in #2 above.
2. Enter "Yes" or "No" for potential "completeness" under each "Contaminated" Media -- Human Receptor combination (Pathway).

   Note: In order to focus the evaluation to the most probable combinations some potential "Contaminated" Media - Human Receptor combinations (Pathways) do not have check spaces ("___"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

   _____ If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter "YE" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

   __**X**__ If yes (pathways are complete for any "Contaminated" Media - Human Receptor combination) - continue after providing supporting explanation.

   _____ If unknown (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter "IN" status code

Rationale and References:

Residences, day care facilities, and food production activities are not located in the vicinity of the Washougal facility.

Current workers could be exposed to contaminated groundwater and soil during excavation activities. In addition, see discussion about indoor air in #2 above.

Construction workers could be exposed to contaminated groundwater and soils during excavations.

Trespassers should not be exposed because the facility is fenced with a locking gate. The facility is currently operating as a private business.

The extent of possible contamination in neighboring Steigerwald Marsh is not completely known, but recreational visitors to the marsh are unlikely to contact or ingest enough contamination to make this a significant pathway of exposure. (See the Draft ***Remedial Investigation Report*****,** dated September 2000.)

4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **"significant"**[4] (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?

   __**X**__ If no (exposures can not be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway) - skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

   _____ If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway) - continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

   _____ If unknown (for any complete pathway) - skip to #6 and enter "IN" status code

Rationale and References:

Current workers should not be exposed to 1) contaminated groundwater because the water is not used for drinking water, and 2) contaminated soil because the contaminated areas are either paved or in the area of the former tank farm area which was excavated to a depth of approximately four to six feet and backfilled during the silt removal interim actions (see ***Final Interim Action Report*****,** dated September 1998)**.** If there is digging below the surface at the facility, workers will be protected by the use of personal protective equipment (PPE) and by following site health and safety plans.

See discussion about indoor air in #2 above. TCE detected in indoor air may be from another potential source in the building. However, PSC has proposed to install a mitigation system to address indoor air in the office spaces in Building 1. PSC submitted a work plan for installation of a sub-slab depressurization system on September 16, 2005. Ecology approved the work plan on September 21, 2005. Within 45 days of Ecology's approval of the work plan, PSC will begin implementing the approved work plan. PSC will conduct an air sampling event within 45 days following completion of the installation of the sub-slab depressurization system.

Construction and other corrective measure activities are not currently occurring on the site. If there is digging below the surface at the facility, construction workers will be protected by the use of personal protective equipment (PPE) and by following health and safety plans. Letters were sent to the City of Washougal and the Port of Camas to warn of potential worker exposure during work in the utility trenches under the adjacent roadway. Workers were encouraged to follow the appropriate precautions and Philip attached portions of their health and safety plan for reference. (Refer to letters dated April 23, 2001, from Philip Services Corporation.)

The extent of possible contamination in neighboring Steigerwald Marsh is not completely known, but recreational visitors to the marsh are unlikely to contact or ingest enough contamination to make this a

[4] If there I any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable" consult a human health Risk Assessment specialist with appropriate education, training and experience.

significant pathway of exposure. (See the Draft ***Remedial Investigation Report*****,** dated September 2000.)

5. Can the "significant" **exposures** (identified in #4) be shown to be within **acceptable** limits?

   _____ If yes (all "significant" exposures have been shown to be within acceptable limits) - continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

   _____ If no (there are current exposures that can be reasonably expected to be "unacceptable") - continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.

   ___ If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code

Rationale and References:

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_____
_____

6. Check the appropriate RCRAInfo status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

   _X__ YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the BEI/Philip Services Corporation facility, EPA ID # WAD092300250, located at 625 South 32nd Street, Washougal, Washington, under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.

   ____ NO - "Current Human Exposures" are NOT "Under Control."

   ___ IN - More information is needed to make a determination.

Completed by _Original signed 9/23/2005__ Date _____
Kaia Petersen
Hydrogeologist/Project Manager

Supervisor __Original signed 9/23/2005_____ Date _____
K Seiler, Section Manager
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FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action
Environmental Indicator (EI) RCRAInfo code (CA750)

Migration of Contaminated Groundwater Under Control
Last Revised: August 2006

Facility Name: BEI/Philip Services Corporation - Washougal
Facility Address: 625 South 32nd Street, Washougal, Washington
Facility EPA ID: WAD 09230 0250

1. Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

   __X__ If yes - check here and continue with #2 below.

   _____ If no - re-evaluate existing data, or

   _____ If data are not available, skip to #8 and enter"IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of

contaminated groundwater and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRAInfo national database ONLY as long as they remain true (i.e., RCRAInfo status codes must be changed when the regulatory authorities become aware of contrary information).

2. Is **groundwater** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

   __X__ If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.

   _____ If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."

   _____ If unknown - skip to #8 and enter "IN" status code.

Rationale and References:

Groundwater sampling results indicate that concentrations of PCE, 1,1-DCE, 1,2-DCE, cis-1,2-DCE, vinyl chloride, benzene, 1,4-dioxane, and arsenic exceed MTCA Method B levels in the shallow groundwater underlying the property. Volatile organic compounds (VOCs) are detected at one deep monitoring well (MC-118D). (Refer to **Quarterly Report, January through March 2006,** dated July 10, 2006, prepared by Philip Services Corporation.)

3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"[2] as defined by the monitoring locations designated at the time of this determination)?

   _____ If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"[2]).

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[1] "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate "levels" (appropriate for the protection of the groundwater resource and its beneficial uses).

[2] "existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring.

_____ If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination") - skip to #8 and enter "NO" status code, after providing an explanation.

__X__ If unknown - skip to #8 and enter "IN" status code.

Rationale and References:

The external boundary of the shallow groundwater plume has not been fully delineated on the east side of the site. Groundwater flows across the site to the east and may be migrating offsite to the Steigerwald Lake National Wildlife Refuge. Groundwater may also be intercepted by the utility trench or trench backfill underneath the adjacent roadway and conducted northward to the Gibbons Creek Remnant Channel. (Refer to the **Annual Groundwater Analysis Report January - December 2003** dated April 15, 2004 and the **Revised Supplemental Remedial Investigation Technical Memorandum**, dated July 8, 2002, by Philip Services Corporation.)

The Department of Ecology has developed a draft list of data gaps in groundwater and soil investigations at the Washougal facility. Once this list has been finalized it will be used to develop requirements for additional remedial investigation activities at the facility. This will be accomplished through an agreed order and permit for corrective action. The Department of Ecology has also contracted with a consulting hydrogeologist for the review of analytical results for arsenic in groundwater at the facility.

Questions about possible vapor intrusion inside the office building at the Washougal facility have been resolved by the installation and continued operation of a subslab depressurization system.

4. Does "contaminated" groundwater **discharge** into **surface water** bodies?

_____ If yes - continue after identifying potentially affected surface water bodies.

_____ If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale and References:

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5. Is the **discharge** of "contaminated" groundwater into surface water likely to be **"insignificant"** (i.e., the maximum concentration[3] of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or

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Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

_____ If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration[3] of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgment/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

_____ If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration[3] of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations[3] greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

_____ If unknown - enter "IN" status code in #8.

Rationale and References:

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6. Can the **discharge** of "contaminated" groundwater into surface water be shown to be "**currently acceptable**" (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented[4])?

_____ If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR

2) providing or referencing an interim-assessment,[5] appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the

[3] As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

[4] Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

[5] The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

_____ If no - (the discharge of "contaminated" groundwater can not be shown to be "**currently acceptable**") - skip to #8 and enter "NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

_____ If unknown - skip to 8 and enter "IN" status code.

Rationale and References:

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7. Will groundwater **monitoring**/measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"

   _____ If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."

   _____ If no - enter "NO" status code in #8.

   _____ If unknown - enter "IN" status code in #8.

Rationale and References:

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8. Check the appropriate RCRAInfo status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

_____ YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the Philip/BEI facility, EPA ID WAD 092300250, located at 625 S 32nd Street, Washougal, Washington. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

_____ NO - Unacceptable migration of contaminated groundwater is observed or expected.

__X__ IN - More information is needed to make a determination.

Completed by Kaia Petersen Date: 8/29/2006
Kaia Petersen
Hydrogeologist/Acting Project Manager

Supervisor K Seiler Date: 9/6/06
K Seiler, Section Manager
Hazardous Waste and Toxics Reduction
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